From: Michael Nelson [mailto:mnelson@cellsignal.com]
Sent: Thursday, March 29, 2012 9:50 AM
To: Baskin, Kathleen (EEA)
Cc: irwainfo@ipswichriver.org
Subject: Ipswich River Water Management

Kathleen Baskin, P.E. (Kathleen.Baskin@state.ma.us)
Director of Water Policy and Planning
Executive Office of Environmental Affairs
100 Cambridge Street
Boston, MA

Dear Ms. Baskin,

I am writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012.

As a lifelong fisherman and wildlife lover I appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry; this is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for the opportunity to comment.

Sincerely,

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